

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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**CHARITY CHIDINMA  
EMERONYE SWIFT,**

**Plaintiff,**

**v.**

**FRONTIER AIRLINES, INC.  
(a Colorado corporation),  
and JANE DOE,**

**Defendants.**

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**Civil Action No. 1:14-cv-1139**

**Hon. Anthony J. Trenga  
Hon. Magistrate Judge Ivan D. Davis**

**MEMORANDUM IN SUPPORT OF  
PLAINTIFF'S MOTION TO EXTEND TIME FOR OBJECTING TO  
DEFENDANT'S INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Plaintiff Charity Chidinma Emeronye Swift ("Mrs. Swift"), through her undersigned attorney, pursuant to Rule 26(C) of the Local Civil Rules, submits this memorandum in support of her motion for an extension of time until January 20, 2015 for making objections to Defendant Frontier Airlines, Inc.'s First Set of Interrogatories to Plaintiff and Defendant Frontier Airlines, Inc.'s First Set of Requests for Production of Documents and Other Things to Plaintiff, which were served by e-mail and mailed on December 18, 2014. Responses were due thirty days after service, by January 17, 2015, but under Rule 6 of the Federal Rules of Civil Procedure, the time for responding was extended for three days to January 20, 2015, because (1) service was by mail and electronically, or alternatively (2) January 17, 2015 was a Saturday, Monday, January 19, 2015 was Martin Luther King, Jr. Day, and the next day that was not a Saturday, Sunday or

federal holiday was Tuesday, January 20, 2015.

Rule 26(C) of the Local Civil Rules require objections to interrogatories or requests for production to be served within fifteen days of service, unless the Court orders a shorter or longer time. Plaintiff did not serve her objections within fifteen days (by January 5, 2015, with three days added for service by mail and electronically), because Defendants indicated that they would like to talk regarding a possible settlement, which she hoped would make it unnecessary to answer Defendant's discovery requests. Unfortunately, settlement negotiations have broken down. Plaintiff Charity Chidinma Emeronye Swift's Responses to Defendant Frontier Airlines, Inc.'s First Set of Interrogatories to Plaintiff is attached as Exhibit 1, and Plaintiff Charity Chidinma Emeronye Swift's Responses to Defendant Frontier Airlines, Inc.'s First Set of Requests for Production of Documents and Other Things to Plaintiff is attached as Exhibit 2, so that the Court may see what objections Plaintiff is making. (Exhibits A - I are the same as the exhibits to the Amended Complaint.) Specifically, Plaintiff objects to Interrogatories 1, 2, 5, 7, 8, 20, 24, and Production Request 42. Plaintiff also objects that the total number of Interrogatories, *including subparts*, exceeds the 25 allowed by Rule 32(a)(1) of the Federal Rules of Civil Procedure.

In light of the unsuccessful settlement negotiations, Plaintiff asks that the Court exercise its discretion to grant her an additional fifteen days for making objections to Defendant's aforementioned discovery requests, said additional days to end on January 20, 2015.

Dated: January 20, 2014

Respectfully submitted,

/s/ Stephen Christopher Swift

Stephen Christopher Swift

Virginia State Bar ID No. 38419

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*Attorney for Plaintiff*

*Charity Chidinma Emeronye Swift*

**CERTIFICATE OF SERVICE**

I hereby certify that, on January 20, 2014, I electronically filed the foregoing document with the Clerk of the Court, using the Court's CM/ECF system, which will automatically cause all counsel of record to be served therewith.

/s/ Stephen Christopher Swift  
Stephen Christopher Swift